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December 4, 1986



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Mr. John Welles, Regional Administrator
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 1300
Denver, Colorado 80202-2413

Dear Mr. Welles:

The Comprehensive Environmental Assessment and Response Program (CEARP) Phase I Installation Assessment of the Rocky Flats Plant has been reviewed by the City of Broomfield's Environmental Division. EPA is using the CEARP as a support document for the RCRA and CERCLA clean-up programs that are currently being developed for the Rocky Flats Plant. As stated in the document, "A major thrust of the CEARP is to determine whether waste disposal practices followed in the past, prior to recognition of potential environmental hazards and/or the passage of environmental legislation, have resulted in environmental problems that require remedial action today."

Broomfield is concerned that several areas that have been contaminated with plutonium released from the Rocky Flats Plant have been screened out in Phase I of the assessment and will never reach the remedial action phase. The data indicate that the plutonium and americium inventories in Great Western Reservoir are approximately 244 milliCuries plutonium and 73 milliCuries americium, and the plutonium-in-soil concentrations on the land surrounding the reservoir exceed the state plutonium-in-soil guideline by more than six times in some areas (CEARP Section V, pages V-48 through V-51). These inventories also exceed background levels, and previous responses to such inventory levels at Rocky Flats included the removal of the radioactive material. See CEARP Section V.A.2., page V-2.

Despite the data and past remedial actions, DOE has concluded that these areas do not pose an environmental risk and do not require further investigation or remedial action. The City requests that EPA thoroughly review the plutonium data and the criteria used by DOE to arrive at this conclusion. The City feels that the data may be sufficient to indicate an environmental risk and that these sites should be included in either the subsequent phases of the CEARP, or EPA's future CERCLA investigations. At the very least, a re-evaluation of the Phase I conclusions with regard to these sites is compelled by the Superfund reauthorization.

ADMIN RECCRD

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Broomfield asks that you review the Phase I assessment with the City's concerns in mind. After completing your review, the City requests a formal response from EPA with regard to the matter, including:

- a. EPA's assessment of the true environmental risk posed by the plutonium contamination including any risks associated with Broomfield's normal operation and maintenance of Great Western Reservoir and its intent to expand the reservoir;
- b. Whether the conclusions of the Phase I assessment will be reevaluated in light of the applicable or relevant and appropriate requirements (ARARs) and the permanent remedies provisions of the Superfund reauthorization; and
- c. Whether an Agency for Toxic Substances and Disease Registry (ATSDR) health assessment will be performed in accordance with the Superfund reauthorization and if, not, why not. If performed, it should investigate, at a minimum, the cumulative effects of the plutonium contamination.

Thank you for your cooperation in this matter. If you have any questions or require further information, please contact me at 466-3104.

Sincerely,

Kathryn Kochevar

Kathryn Kochevar
Chemist/Environmental Specialist

cc: Peter Bierbaum, Colorado Department of Health
Gary Potter, Department of Energy